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Prepped by Ollie Stewart

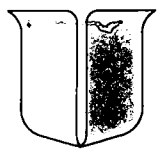
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A-91-46

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United Refining Company

Thomas C. Covert
Executive Vice President
Operations

October 22, 1991

Mr. William K. Reilly, Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

RE: Docket A-91-46
 Ethyl Corporation's Waiver Application -
 HiTEC 3000

Dear Mr. Riley:

United Refining Company would like to voice its support for Ethyl Corporation's recently resubmitted waiver application for HiTEC 3000.

Ethyl's test data shows that HiTEC 3000 has the dual benefit of helping reduce NOx emissions as well as toxic emissions. Since reformulated gasoline requires oxygenates and oxygenates have been found to contribute to NOx formation, use of HiTEC 3000 will help reduce this negative aspect of oxygenate usage. By providing gasoline octane enhancement, HiTEC 3000 will reduce refinery processing severity and gasoline aromatic content so that toxic emissions will also be reduced.

United's support of HiTEC 3000 is based on the above mentioned benefits of this additive towards meeting the goals of the Clean Air Act.

Yours truly,

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